

Appendix A. Public Comment Analysis and Response for GV SB and SAD Treatments EA.			
Comment #	Comment Subject	Comment	Comment Response
Rocky Mountain Wild – received September 15, 2011			
1.1	Silviculture	We believe that every effort must be made to save existing small trees, often referred to as advanced regeneration. The EA's design criteria should unambiguously state that all efforts will be made to provide maximum protection for existing small trees.	Skid trail and landing locations will be located to avoid advanced regeneration to the greatest extent possible. This will be kept to a minimum by wider skid trail spacing and also by the silviculturist and wildlife biologist working with Forest Service Representative (FSR) to conserve as much natural regeneration as possible. Harvesting equipment operating off trails will be instructed to avoid natural regeneration and the FSR and silviculturist will continually evaluate this to assure compliance. It is inevitable that some advanced regeneration will be lost from harvesting activities associated with commercial timber sales.
1.2	Wildlife	The EA does not contain a discussion of the possible cumulative impacts to lynx because "[f]uture federal actions" would "require separate consultation pursuant to section 7 of the [Endangered Species] Act". EA at 24. The Forest Service still has the responsibility to disclose potential cumulative impacts under the National Environmental Policy Act. Also, it is possible that current and proposed actions by non-federal entities could affect lynx habitat.	Comment Noted. The wildlife cumulative impacts section has been disclosed. <i>On page 24 the following has been added to address this:</i> Historical uses and activities occurring within the analysis area are expected to continue at similar levels. Those that may have a cumulative effect on wildlife resources include canopy removal, livestock grazing, the existing road and trail system, recreational uses, and the existing water development infrastructure. They are either widespread and of low intensity or limited in extent and high intensity. All future decisions relating to these types of uses would require new NEPA analysis and USFWS consultation.

1.3	Silviculturethere needs to be some restriction and supervision of such operations (firewood gathering). Firewood gatherers could transport beetle-laden wood, which might allow beetles to colonize new areas.	A public education handout will be distributed to all firewood cutters which will explain measures which will help prevent the spread of the spruce beetle. The handout will explain that in actively infested areas of the Grand Mesa firewood gathered would have to be from wood where the beetles have emerged. This means that firewood 7" in diameter and larger can only be removed if it has less than 50% tight bark. Any material in which the beetles have not emerged will be burned in piles at the landing so that firewood gathers do not utilize this wood. Signs may be placed if there are indications that the public is attempting to remove wood from burn piles.
1.4	Silviculture	Thus we recommend material at least as small as six inches in diameter be treated to ensure that beetle breeding does not occur. Treatment could include peeling the bark, "solarizing" (i. e., placed in the sun and turned to kill any beetles with heat), or burned.	The GMUG and other Rocky Mountain region forests have used the guideline of treating only logging slash greater than 8" for many years. However the district will stipulate that slash seven inches and greater in diameter will be treated at the landing by "piling and burning".
1.5	Timber Operations	The undersigned believe that all new roads constructed or reopened and used for the proposed project should be completely obliterated after the need for them ends. Obliteration means completely removing the physical structure of the road as much as possible.	As per direction of the Forest Plan (III-80) the district will obliterate all temporary roads constructed. All proposed roads would be temporary. Temporary roads may be left open in the short term and gated, in the event that the infestation continues to attack trees in the area.
1.6	Range	The Monitoring section does say that the "rangeland management specialist would monitor disturbed areas...for at least two years... <u>after</u> the disturbance	Proposed project areas will be surveyed prior to the beginning of operations and treated if infestations of noxious weeds are

		occurred". EA at 15; emphasis added. A design criterion must require survey and eradication of noxious weeds <u>before</u> operations begin.	found.
1.7	Range	<p>Some measure will have to be taken to reduce the impacts of livestock and big game. These could include constructing barriers with the trees felled and working with livestock permittees in advance to secure other areas for their stock to graze. Livestock may have to be kept out of aspen regeneration areas for several years to ensure the success of regeneration.</p> <p>We find no mention of this issue in the discussion of impacts from the project in the EA, nor are there any design criteria to address this issue.</p>	<p>Due to the scope of the proposal, we are unsure if the areas to be treated will be located in areas being actively grazed by domestic livestock. If they are located in areas of primary range and regeneration surveys determine impacts are due to domestic livestock, Annual Operating Instructions will be developed on a yearly basis to modify the grazing to ensure adequate regeneration is occurring.</p> <p>In the EA, there is a design criteria which calls for the use of temporary fencing as necessary to protect aspen regeneration from grazing (EA page 11). In addition to this, if wild game are found to be adversely affecting regeneration, big game repellent (BGR) would be applied to reduce damage. The district required to insure a fully stocked aspen stand by five years after harvest.</p>
1.8	Visual Quality	Logging would degrade scenery to some extent, but effects could be reduced with proper design. However, we find no analysis of the possible impacts to scenery in the EA, nor are there any design criteria related to scenery. This must be corrected prior to approval. The Forest Service should issue an EA supplement that addresses the scenery issue and allow public comment on it.	The forest plan specifically addresses the issue of protecting visual quality as they relate to vegetation management activities on the forest by management area (GMUG Forest Plan III-86 – III-202). The commenter also raised this issue in the scoping phase of this project. With clear direction from the Forest Plan and Visual Quality Objectives (VQO's) the interdisciplinary team did not feel that this rose to the level of being a key

			issue. Additionally, as mentioned in the EA all potential harvest treatments will be reviewed by the IDT and the team will rely of the Recreation shop to provide any additional recommendations on protecting visuals quality.
Mesa County Department of Planning and Economic Development- received August 30, 2011			
2.1	Land Use	Mesa County supports the prudent use of public lands and resources. The approach the Forest Service is proposing to deal with these issues appears appropriate. We appreciate the cooperative relationship Mesa County has with the Grand Mesa, Uncompahgre Forest Service.	Comment Noted
2.2	NEPA	The preferred alternative appears to provide the quickest and most extensive treatment to the affected areas of the Forest, but we understand funding may not be available for this more aggressive alternative. If funding is not available we support Alternative 3 the scaled-back approach. We do not support the No Action Alternative given the severity of the health of the forest.	Comment Noted
2.3	NEPA	Pursuant to our Memorandum of Understanding, MOU, with the Forest Service (FS Agreement No. 06-MU-11020402-036) we are pleased to offer the following in response to your solicitation for comments.	Comment Noted.
2.4	Land Use	Section D. 4 of our MOU states the "Forest Service shall: Stipulate in land use authorizations by reference compliance with the regulations of all Federal, State, County and municipal laws, ordinances or regulations that are applicable to the area."	Comment Noted. In the EA and in supporting documents compliance with all relevant federal, state, and local regulations and policies will be stipulated.
2.5	Land Use	Certain sections of the <i>Mesa County Land Development Code</i> may be applicable.	Comment Noted.
2.6	Land Use	Section 3.9 Floodplain Development Permit	Comment Noted. Project would be in

			compliance, and will not require such permits.
2.7	Land Use	5.2.9 Large Construction Projects and Restrictions Larger construction jobs hauling more than 4,500 tons of material within one month may be subject to restrictions on County roads.	Comment Noted. Project would be in compliance.
2.8	Land Use	5.2.24 Forestry Support Services	Comment Noted. Project would be in compliance.
2.9	Wildlife	7.6.4 We appreciate the Forest Service will consult with the Colorado Division of Parks and Wildlife. As stated in the EA potential impacts to wildlife may be mitigated through several techniques including seasonal timing of the projects and exercise of best management practices. It is important that the projects are also timed to not interfere with hunting seasons.	The Colorado Division of Wildlife has been contacted regarding this project and continued coordination will occur.
2.10	NEPA	Pursuant to Section D.5 of our MOU we request the Forest Service provide Mesa County GIS data sets for the maps in the EA. The hard copy maps are difficult to read and use, especially due to the scale of the maps and lack of road labels and other reference points. Please contact our GIS staff at 970-244-1880 for details.	Comment Noted. Information request.
2.11	Range	Weed Management We request that you include a comprehensive weed management plan (including follow-up control measures, watering, fencing, multi-year herbicide application for certain weed species, etc.) as an element of the reclamation plan for disturbed areas of harvest, reclamation of new road construction, and any skid roads or other accessory/access roads. Please coordinate with the Mesa County Tri-River Extension Service at 970-244-1834.	Weed surveys and treatment will be conducted prior to treatment and accomplished through KV planning and funding.
2.12	Land Use	County Roads. In accordance with the Mesa County Road Access Policy, we require a Notice of Intent (NOI)	Comment Noted. Use of county roads in both Delta and Mesa Counties is anticipated

		<p>to access county roads. Mesa County requires an access permit for any new access or change in use of an access to and from county roads. Additional county permits that may be required include: grading, building, surface disturbance permits for work within County rights-of-way.</p> <p>Any mitigation for potential road impacts should be coordinated with any energy development or other heavy- vehicle and high traffic projects. This appears especially relevant east of Vega Reservoir.</p> <p>Oversize/overweight vehicles on Mesa County roads are required to obtain Extra Legal permits (call 970-244-1765).</p>	<p>to be needed for this project. However, no new access points are anticipated in conjunction with the project. New routes needed to implement the project would be located on National Forest System (NFS) lands. Purchasers / operators would provide the required NOI and obtain any pertinent access permits.</p>
2.13	Land Use	<p>We encourage the USFS and any timber contractors to use Mesa County's web-based GIS tool known as EPOM (Energy Policy Opportunity Map) to identify various potential impacts of concern to Mesa County (e.g., water quality, visibility, noise, dust, etc.)and are encouraged US Forest Service best management practices will be required to be employed.</p>	<p>Comment noted.</p>
2.14	Land Use	<p>Private In-Holdings Potential projects on the Uncompahgre Forest include numerous adjacent private property in-holdings. Proposed treatment areas should done in coordination with private landowners regarding issues such as timing, noise, dust, road impacts, and the possibly conducting joint projects on private lands. Coordination with the Colorado State Forest Service is encouraged.</p>	<p>Comment noted. All private landowners adjacent to NFS lands were contacted with the scoping document. Any specific private land owners potentially impacted from operations proposed in this EA would be contacted, briefed and their comments taken into consideration. The USFS will coordinate with the Colorado State Forest Service where appropriate.</p>
2.15	Land Use	<p>Energy and Mineral Resources. The EA states any potential impact on leased natural gas fields or other mineral extraction projects needs to be analyzed and address, at a minimum, coordination of timing and cumulative impacts. Please see Mesa County Energy</p>	<p>Comment noted.</p>

		and Mineral Resources Plan at: http://www.mesacounty.us/planning.energy/masterplan.aspx .	
2.16	Land Use	Historic and Scenic Byways and Tourism. We encourage coordination with the Grand Mesa and Unaweeep Tabeguache Historic and Scenic Byway Committees and the Grand Junction Visitor and Convention Bureau on timing and other issues (e.g., visibility from Byways, campground and trail closures, special events, etc.)	Comment noted.
2.17	NEPA	Thank you for your consideration. Please keep us updated on the projects as they progress.	Comment Noted. Information request. We will keep your office informed on any future developments of the project.